



## **The Energy and Technology Committee**

**Public Hearing, March 1, 2016**

**Office of Consumer Counsel**

**Elin Swanson Katz, Consumer Counsel**

Testimony of Elin Swanson Katz

**Raised Bill No. 103,  
*An Act Concerning the Responsibilities of the Procurement Manager of the  
Public Utilities Regulatory Authority and Minor Revisions to Energy-Related  
Statutes***

The Office of Consumer Counsel (OCC) has carefully reviewed Raised Bill No. 103, *An Act Concerning the Responsibilities of the Procurement Manager of the Public Utilities Regulatory Authority and Minor Revisions to Energy-Related Statutes*. OCC supports the minor revisions to energy-related statutes offered in the bill, and opposes the sections of the bill that would eliminate the Procurement Manager of the Public Utilities Regulatory Authority (PURA).

As to the minor revisions to the energy statutes, Sections 1 and 2 adjust General Statutes §§ 16-19(g) and 16-262w so that utility overearnings will be measured uniformly based on the latest two consecutive financial quarters rather than on a monthly or annual basis. OCC supports these changes because focus on the last two quarters provides a reasonable time frame for analysis of utility earnings, and because of the benefits of uniformity.

Sections 3 and 4 contain what appear to be minor adjustments and clarifications to retail electric supplier licensing and disclosure requirements, including, in Section 4, a clarification of PURA's authority over advertising claims as to the renewable content of retail electric supply offers. OCC supports these changes.

Section 5 would amend General Statutes § 16-245o to extend from seven days to two billing cycles (roughly sixty days) the period for which a customer would be protected from early termination fees upon renewal of a contract with a retail electric supplier. OCC supports this change so that customers will have ample notice through the electric bill of a supplier's renewal price before being committed to such price. Moreover, since the purpose of an early termination fee is primarily to cover customer acquisition, and since this new limitation deals not with customer acquisition but customer renewal, this restriction on early termination fees should not unduly impact the electric suppliers' business model.

Sections 6-14 would eliminate the Procurement Manager of PURA and shift his duties to other PURA employees. OCC opposes this change as unnecessary and detrimental. The present Procurement Manager, Mr. Jeffrey Gaudiosi, has been involved in several successful procurements of standard service and has experience in making the purchasing decisions for the standard service product which is again being utilized by more than half of the eligible customers. The Procurement Manager also has significant involvement in various multi-million dollar procurements of energy resources being conducted by the Department of Energy and Environmental Protection. Moreover, no efficiencies would be created through this proposal because the Procurement Manager has been given the duties of the PURA Executive Secretary to ensure that the overall responsibilities warrant a full-time position. OCC therefore does not see the benefit and does anticipate potential harm in losing the designated position of Procurement Manager.